

# Exhibit 3

**From:** [Bonner, Kelly](#)  
**To:** [Christopher Geddis](#)  
**Cc:** [Goldberg, Seth A.](#); [Priselac, Jessica](#); [Schwartz, Barbara](#); [Hill, Coleen W.](#); [Hansen, Forrest](#); [Adam Slater](#); [lhilton@kanner-law.com](#); [George T. Williamson](#); [Cheryll Calderon](#); [David Hobbs](#)  
**Subject:** RE: Valsartan, Losartan, and Irbesartan MDL  
**Date:** Thursday, April 29, 2021 10:12:39 AM

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Counsel,

Plaintiffs have failed to assert specific challenges to each of the documents at issue, and further failed to articulate how each challenged document relates to, let alone informs the public's interest in public health (a request we have made, but which has been to date disregarded by Plaintiffs).

If, as I am assuming, you intended to say "the ZHP Parties' knowledge" regarding the nitrosamine impurity, then the ZHP Parties deny your characterization

As you acknowledge, these documents are subject to the ZHP Parties' sealing motion, which has been fully briefed. We await the Court's decision clarifying this issue.

Thank you,  
Kelly

**Kelly A. Bonner**  
Associate

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**From:** Christopher Geddis <[CGeddis@mazieslater.com](mailto:CGeddis@mazieslater.com)>

**Sent:** Tuesday, April 27, 2021 6:34 PM

**To:** Bonner, Kelly <[KABonner@duanemorris.com](mailto:KABonner@duanemorris.com)>

**Cc:** Goldberg, Seth A. <[SAGoldberg@duanemorris.com](mailto:SAGoldberg@duanemorris.com)>; Priselac, Jessica <[JPriselac@duanemorris.com](mailto:JPriselac@duanemorris.com)>; Schwartz, Barbara <[BASchwartz@duanemorris.com](mailto:BASchwartz@duanemorris.com)>; Hill, Coleen W. <[CWHill@duanemorris.com](mailto:CWHill@duanemorris.com)>; Hansen, Forrest <[FRHansen@duanemorris.com](mailto:FRHansen@duanemorris.com)>; Adam Slater <[ASlater@mazieslater.com](mailto:ASlater@mazieslater.com)>; lhilton@kanner-law.com; George T. Williamson <[gwilliamson@farr.com](mailto:gwilliamson@farr.com)>; Cheryll Calderon <[ccalderon@mazieslater.com](mailto:ccalderon@mazieslater.com)>; David\_Hobbs <[david\\_hobbs@fleming-law.com](mailto:david_hobbs@fleming-law.com)>

**Subject:** FW: Valsartan, Losartan, and Irbesartan MDL

Counsel,

Some of the exhibits to Plaintiffs' letter are subject to your current motion for a protective order. In light of the public interest in the contamination of ZHP's valsartan and its knowledge of the more widespread problem at least a year before the recalls, Plaintiffs challenge the confidentiality of the remaining exhibits as described

in their letter.

Best,  
Chris

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**From:** Christopher Geddis

**Sent:** Tuesday, April 27, 2021 2:50 PM

**To:** Robert Kugler <[Judge\\_Robert\\_Kugler@njd.uscourts.gov](mailto:Judge_Robert_Kugler@njd.uscourts.gov)>; tiv\_stevenslee.com  
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**Subject:** Valsartan, Losartan, and Irbesartan MDL

Dear Judge Kugler and Judge Vanaskie:

Plaintiffs' unredacted letter regarding tomorrow's case management conference is attached to this email. The letter and exhibits are available at the following link:

 The version filed on ECF is heavily redacted and does not contain the exhibits due to ZHP's extensive confidentiality designations.

For the Court's convenience, Plaintiffs have also attached their opposition to ZHP's motion for a protective order regarding its depositions to this email. It was filed on ECF yesterday.

Respectfully,  
Chris

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